

## REMARKS

Reconsideration of the above-identified application is respectfully requested.

Claim 1 was rejected as indefinite for the use of the pronoun "its." Claim 1 has been amended to delete the pronoun.

Claims 1–8, 12–18 were rejected as anticipated by Quazi. MPEP §2131 loudly proclaims in boldface, uppercase letters **"TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY ELEMENT OF THE CLAIM."** It is respectfully submitted that the Examiner is not following this directive.

In support of the rejection, the Examiner refers to FIG. 10 of the Quazi patent and to column 3, lines 19+, which describe FIG. 3 of the Quazi patent. This discrepancy makes the discussion somewhat unclear.

FIG. 10 of the Quazi patent (which is mis-drawn, diode D1 should be below the junction indicated by a black dot) shows power switches Q1 and Q2, as does FIG. 3 of the Quazi patent, and a "feedback loop" that is not described in the detailed description of the invention. The legend below the line representing the feedback loop suggests that the feedback is for constant filament voltage, which is obviously irrelevant to the claimed invention. The Examiner's reliance on FIG. 10 appears to be in error.

A feedback loop is described for FIGS. 6–9 as follows.

"Referring to FIGS. 6, 7, and 8, the feedback loop is shown not connected to any particular point. Rather, the connection point is determined by which voltage or current is to be controlled. Thus, if the line voltage is to be regulated between certain maximum and minimum voltages, the feedback loop may be connected before the resonant inductors  $L_R$  such as at the point M in FIG. 7. Typically, the line voltage would be converted to a DC voltage by a full wave rectifier or the like and appropriately filtered before being applied to the high voltage DC terminals of FIGS. 6 through 8." [column 6, lines 8–18]

"Referring to FIG. 9, the feedback loop may be applied to pin 1 – that is, the inverted input of the error amplifier. Applied to pin 2 would be a reference voltage such as the internally generated  $V_{REF}$ . The output of the error amplifier is employed to pulse width modulate the control signal

pulses occurring at outputs A and B of the control circuit as illustrated in FIGS. 6 through 9." [column 6, lines 19-25]

"With proper feedback, the ballast can be made to provide constant light output irrespective of the line voltage variation." [column 10, lines 26-28]

Note that voltage or current is controlled (*"the connection point is determined by which voltage or current is to be controlled."*).

1. The Quazi patent does not disclose or teach controlling **power** during steady state operation, as recited. The Quazi patent discloses controlling either voltage or current. Therefore, there is no anticipation.
2. The Quazi patent does not disclose or teach controlling current while starting, as recited. Therefore, there is no anticipation.

Claim 10 was rejected as unpatentable over Quazi in view of Williamson. The Williamson patent overcomes none of the deficiencies of the Quazi patent identified above.

The allowance in substance of claims 9 and 11 is noted with appreciation.

In view of the foregoing remarks, it is respectfully submitted that claims 1-18 are in condition for allowance and a Notice to that effect is respectfully requested.

Respectfully submitted,



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